

**WORTHE HANSON & WORTHE**

A Law Corporation

1851 East First Street, Ste. 860

Santa Ana, California 92705

Telephone (714) 285-9600

Facsimile (714) 285-9700

[tworthe@whwlawcorp.com](mailto:tworthe@whwlawcorp.com)

TODD C. WORTHE, SBN 177452

MACKENZIE C. FOELLMER, SBN 255721

Attorneys for Defendant, UNITED AIRLINES, INC.

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

PATSY MOON, an individual

Plaintiff,

v.

UNITED AIRLINES, INC., a Delaware  
corporation; and DOES 1 - 60, inclusive.

Defendants.

USDC Case No.  
[State Court Case No.  
22STCV07025]

**NOTICE OF REMOVAL OF  
ACTION UNDER 28 U.S.C. §  
1446(b) AND 28 U.S.C. § 1332(a)**

Complaint Filed: 02/25/2022

WORTHE HANSON & WORTHE  
1851 EAST FIRST ST., SUITE 860  
SANTA ANA, CALIFORNIA 92705  
TELEPHONE: (714) 285-9600

**JURISDICTION** of this Court is invoked on the basis of diversity of  
citizenship and pursuant to 28 U.S.C. 1332, 28 U.S.C. 1441 and 28 U.S.C. 1446.

**TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

**PLEASE TAKE NOTICE** that Defendant, UNITED AIRLINES, INC., hereby  
removes to this Court the State Court Action described below.

1. Defendant, UNITED AIRLINES, INC., hereby invokes the jurisdiction of  
this Court based upon the provisions of 28 U.S.C. § 1332 and 28 U.S.C. § 1446, on  
the basis of diversity of citizenship.

2. On February 25, 2022, an action was commenced in the Superior Court of  
the State of California in and for the County of Los Angeles, entitled "*Moon v. United  
Airlines, Inc., et al.*" bearing Case No. 22STCV07025. [A copy of Plaintiff's

WORTHE HANSON & WORTHE  
1851 EAST FIRST ST., SUITE 860  
SANTA ANA, CALIFORNIA 92705  
TELEPHONE: (714) 285-9600

Complaint is attached hereto as **Exhibit “A.”**] The Complaint was not a document from which this case could be removed.

3. The Complaint in this matter was served on CT Corporation System, Registered Agent for Service of Process for Defendant, UNITED AIRLINES, INC., on March 1, 2022. [A copy of the Service of Process Transmittal is attached hereto as **Exhibit “B.”**]

4. On March 8, 2022, Defendant, UNITED AIRLINES, INC., served its Answer to Plaintiff’s Complaint, including a demand for Jury, which was filed with the Los Angeles County Superior Court on March 8, 2022, a copy of that Answer is attached hereto as **Exhibit “C.”**

5. On March 25, 2022, Plaintiff served a Statement of Damages [A copy of Statement of Damages is attached hereto as **Exhibit “D.”**] Plaintiff’s Statement of Damages, set forth general damages in excess of Five Million Dollars and Zero Cents (\$5,000,000.00); and special damages in excess of Twenty Two Thousand Seven Hundred Ninety One Dollars and Thirty One Cents (\$22,791.31) Plaintiff’s damages currently total Five Million Twenty Two Thousand Seven Hundred Ninety One Dollars and Thirty One Cents ( \$5,022,791.31).

6. Pursuant to 28 U.S.C. § 1446(b), defendant has thirty (30) days from the date it receive the Plaintiff’s Statement of Damages, to and including April 22,2022, to remove this matter to the United States District Court for the Central District of California, since the Statement of Damages is “other paper from which it may first be ascertained that the case is removable on the basis of jurisdiction conferred by Section 1332 of this Title..”

7. This is a civil action wherein the matter in controversy exceeds the sum of \$75,000.00, as evidenced by **Exhibit “D.”**

8. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332, and is one which may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C. § 1332(a), in that it is a civil

1 action wherein the matter in controversy exceeds the sum of \$75,000.00.

2 9. Plaintiff, Patsy Moon, is, a citizen of the State of California, based upon  
3 Plaintiff's Complaint, as evidenced by **Exhibit "A"** at page 2:7-8.

4 10. Defendant, UNITED AIRLINES, INC., was, at the time of the filing of  
5 this action, and still is, incorporated under the laws of the State of Delaware, having  
6 its principal place of business in Chicago within the State of Illinois.

7 11. Accordingly, the United States District Court for the Central District of  
8 California - Central Division, has diversity jurisdiction, and this action is properly  
9 removed pursuant to 28 U.S.C., §1332(a), et seq.

10 DATED: March 30, 2022

**WORTHE HANSON & WORTHE**

11  
12 By: /s/ Todd C. Worthe  
13 **TODD C. WORTHE, ESQ.**  
14 Attorneys for Defendant, UNITED  
15 AIRLINES, INC.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

WORTHE HANSON & WORTHE  
1851 EAST FIRST ST., SUITE 860  
SANTA ANA, CALIFORNIA 92705  
TELEPHONE: (714) 285-9600



**PROOF OF SERVICE**

STATE OF CALIFORNIA)  
COUNTY OF ORANGE )<sup>ss</sup>

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1851 East First Street, Suite 860, Santa Ana, California 92705.

On March 30, 2022, I served the foregoing document described as: **NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1446(b) AND 28 U.S.C. § 1332(a)** on all interested parties in said action by:

☐ BY FACSIMILE TRANSMISSION from FAX No. (714)285-9700 to the FAX number(s) listed below. The facsimile machine I used complied with Rule 2003(3) and no error was report by the machine. Fax Number(s):

☐ BY PERSONAL SERVICE as follows: I caused such envelope to be delivered by hand to the offices of the addressee.

☒ BY THE E.C.F. SYSTEM as follows:

☒ BY MAIL as follows:

☒ placing ☐ the original ☒ a true copy thereof in a sealed envelope addressed as stated on the ATTACHED MAILING LIST.

☒ I deposited such envelope in the mail at Santa Ana, California. The envelope was mailed with postage thereon fully prepaid.

☒ I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Santa Ana, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

AND

☐ BY OVERNIGHT DELIVERY (VIA FEDERAL EXPRESS): I deposited such an envelope in a box or other facility regularly maintained by express service carrier, or delivered to an authorized courier or driver authorized by the express service carrier to receive documents in an envelope or package designated by the express service carrier with delivery fees paid or provided for, addressed to the person on whom it is to be served as indicated on the attached Service List, at the office address as last given by that person on any document filed in the case and served o the party making service.

☐ BY ELECTRONIC MAIL TO: [BH@BelalHamidehLaw.com](mailto:BH@BelalHamidehLaw.com); [Stuart@nflawfirm.com](mailto:Stuart@nflawfirm.com); and [gbeugelmans@nflawfirm.com](mailto:gbeugelmans@nflawfirm.com)

☐ STATE - I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ FEDERAL - I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on March 30, 2022, at Santa Ana, California.

  
LACY ROBERTS

**PROOF OF SERVICE**

WORTHE, HANSON & WORTHE  
1851 EAST FIRST ST., SUITE 860  
SANTA ANA, CALIFORNIA 92705  
TELEPHONE: (714) 285-9600

**SERVICE LIST**  
*Moon v. United Airlines, Inc.*  
LASC Case No. 22STCV07025  
USDC Case No. Unassigned

Belal Ghaleb Hamideh  
Belal Hamideh Law, P.C.  
111 W. Ocean Blvd., Ste. 424  
Long Beach, CA 90802-4633  
Phone: 562-276-2140  
Facsimile: 562-309-8100  
E-Mail: [BH@BelalHamidehLaw.com](mailto:BH@BelalHamidehLaw.com)

Stuart R. Fraenkel  
Gabriel Beufelmans  
Nelson & Fraenkel LLP  
601 South Figueroa St., Ste. 2050  
Los Angeles, CA 90017  
Phone: 844-622-6469  
Facsimile: 213-622-6019  
E-Mail: [stuart@nflawfirm.com](mailto:stuart@nflawfirm.com); [gbeugelmans@nflawfirm.com](mailto:gbeugelmans@nflawfirm.com)  
**ATTORNEYS FOR PLAINTIFF, PATSY MOON**

WORTHE, HANSON & WORTHE  
1851 EAST FIRST ST., SUITE 860  
SANTA ANA, CALIFORNIA 92705  
TELEPHONE: (714) 285-9600